

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO: WAVE 13 CASES LISTED ON PLAINTIFFS' EXHIBIT A	Wave 13 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSES
REGARDING CHRISTINA PRAMUDJI FOR WAVE 13**

Plaintiffs filed a Notice of Adoption [Dkt. 8943] in the Wave 13 cases identified in Exhibit A to their Notice, adopting their Motion to Exclude Certain Opinions and Testimony of Christina Pramudji, M.D. and Supporting Memorandum from Wave 1 [Dkt. 2035; 2037; 2236]. Defendants hereby adopt and incorporate by reference their *Daubert* responses filed in relation to Christina Pramudji, M.D. for Ethicon Wave 1 [Dkt. 2153] and Ethicon Wave 2 [Dkt. 2530]. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 1 and Wave 2 response briefing.

Respectfully submitted,

/s/ William M. Gage

William M. Gage (MS Bar #8691)

Butler Snow LLP

1020 Highland Colony Parkway

Suite 1400 (39157)

P.O. Box 6010

Ridgeland, MS 39158-6010

(601) 985-4561

william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
William M. Gage